

REMARKS

There are 30 claims pending. Claims 1, 11, 17, and 27 are the independent claims. Claims 1 and 21 have been amended to correct a typographical error. Claims 1, 11, 17, and 27 have also been amended. Claim 5 has been canceled.

Independent claims 1 and 17 stand rejected as being unpatentable over Evans (5,506,928) in view of Nguyen (5,194,105).

With respect to independent claim 1, Evans whether taken alone or in combination with Nguyen does not teach or suggest an apparatus for placing a fiber on a substrate that includes a fiber holder that “holds the fiber in a groove formed in a bottom surface of the fiber holder between the plunger and a substrate groove” and “holds the fiber in longitudinal alignment with the tip of the plunger and the substrate groove” as recited in claim 1. To the contrary, Evans teaches a system in which “the gripper is moved to a pickup tray 10... it is then transported by the gripper to the area of the camera, so that its precise location in relation to the target may then be determined, prior to final positioning.” See Col. 3, lines 60-66. In other words, Evans aligns the fiber to a groove only after retrieving a fiber from a pickup tray (see fig. 3). Similarly, Nguyen teaches a system for placement of ball lenses and fibers in which an apparatus is “moved first to a tray of ball lenses... the apparatus 11 then is moved to a location over the depression 13 of the substrate.” See Col. 2 lines 52-57. In Nguyen, the fiber is aligned only after being retrieved from the tray. Thus, Evans whether taken alone or in combination with Nguyen does not teach or suggest a fiber tray that holds “the fiber in longitudinal alignment with the tip of the plunger and the substrate groove” as claimed.

With respect to independent claim 17, it recites a method that includes “positioning the fiber magazine between a plunger and a substrate groove” and “holding the fiber in longitudinal alignment with a tip of the plunger and the substrate groove.” Accordingly, it distinguishes over Evans and Nguyen for the same reasons as those set forth above for claim 1.

Independent claims 11 and 27 stand rejected as anticipated by Basavanhally (5,135,590).

With respect to independent claim 11, claim 11 recites a system that includes a fiber magazine that “draws a flow of air through the airflow holes, the forces associated with the flow

of air holding the fibers within the plurality of grooves.” During operation “the fiber magazine is positioned between the plunger and a substrate groove, and wherein the fiber holder holds the fiber in longitudinal alignment with a tip of the plunger and the substrate groove.” Basavanhally teaches a system that aligns fibers to apertures in a guiding plate. The guiding plate “assists in the assembly of the matrix array of fibers... and insertion in an aperture 18 constitutes a gross alignment of the fiber with a corresponding aperture.” See Col. 3, lines 50-56 and figures 3, 7, and 9. In other words, Basavanhally aligns the fiber held by the fiber tray to a “funnel shaped” aperture and does not teach or suggest aligning the fiber held by the fiber magazine to a “plunger tip and the substrate groove” as claimed.

With respect to independent claim 27, it recites a method that includes “holding a plurality of fibers within a plurality of grooves formed in a surface of a fiber magazine; positioning the fiber magazine between a plunger and a substrate groove; and holding the fiber in longitudinal alignment with a tip of the plunger and the substrate groove.” Accordingly, it distinguishes Basavanhally for the same reasons as those set forth above for claim 11.

The only remaining rejections are prior art rejections of dependent claims, which we submit are allowable for at least those reasons set forth above for the independent claims.

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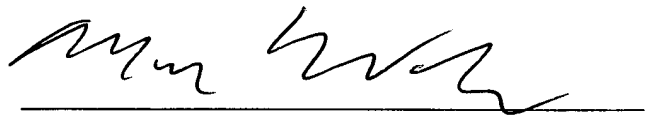
Applicant asks that all claims be allowed.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

12/30/03



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*See attached document certifying that Marc M. Wefers has limited recognition to practice before the U.S. Patent and Trademark Office under 37 C.F.R. § 10.9(b).

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